

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
MICHAEL D. MOORE, : CHAPTER 13
Debtor :
CHARLES J. DEHART, III : CASE NO. 1:17-bk-00721RNO
STANDING CHAPTER 13 :
TRUSTEE, :
v. :
MICHAEL D. MOORE, :
Respondent :
:

**ANSWER TO TRUSTEE'S OBJECTION TO
SECOND AMENDED CHAPTER 13 PLAN**

AND NOW COMES Debtor, Michael D. Moore, by and through his undersigned counsel, answering Trustee's Objection to Second Amended Chapter 13 Plan as follows:

1. Denied. Debtor has provided all disposable income pursuant to 11 U.S.C. Sec. 1322(a)(1) reflected in the bankruptcy schedules I and J filed on February 24, 2017.
2. Denied. Proof of Claim #6 filed by Capital One, N.A. is not a joint claim and the Debtor is the sole responsible obligor of this debt. The supporting documentation filed in conjunction with Official Form 410 also states that the account holder(s) name is only Michael D. Moore. In addition, credit reports provided to the Trustee's office further supports Debtor is the sole responsible party and the account is not a joint debt.
3. Denied. The averment contains that the Plan is not feasible but does not specify for what reasons. Debtor has provided all documentation requested by the Trustee's office.

WHEREFORE, Debtor respectfully requests that the Trustee's Objection to the Second Amended Chapter 13 Plan be overruled, and since there are no further timely filed objections, requests this Honorable Court to approve Debtor's Second Amended Plan.

Respectfully submitted,

LAW OFFICES OF CRAIG A. DIEHL

Date: August 15, 2017

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